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11 Attorneys for: Defendants CAL TEX HOSPITALITY, L.L.C., METRO HOSPITALITY  
12 SERVICES, INC., and THANDI ENTERPRISES LLC

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15 **UNITED STATES DISTRICT COURT,**  
16 **EASTERN DISTRICT OF CALIFORNIA**

17 JANE DOE, an individual

18 Plaintiff,

19 v.

20 WYNDHAM HOTEL & RESORTS, INC.;  
21 THANDI ENTERPRISES, L.L.C.; CAL  
22 TEX HOSPITALITY, L.L.C.; METRO  
23 HOSPITALITY SERVICES, INC.; RED  
24 ROOF INNS, INC.; OCEANIC FRESNO,  
25 L.P.; VAGABOND INN CORPORATION;  
26 BOOTA SINGH CHARIL, as an  
27 individual trustee of CHARIL FAMILY  
28 TRUST; KULDIP KAUR CHARIL, as an  
individual trustee of CHARIL FAMILY  
TRUST; KANTILAL B. PATEL, as an  
individual trustee of PATEL K B & I K  
LIVING TRUST; INDIRABEN K.  
PATEL, as an individual trustee of  
PATEL KB & I K LIVING TRUST;  
MADHUBEN K. PATEL, an individual;  
JAGRATI D. BHAKTA, an individual;  
ROGER BHAKTA, an individual; and  
ROES 1-200, inclusive,

Defendants.

Case No. 1:25-CV-00026-JLT-BAM

**STIPULATION TO EXTEND TIME FOR  
DEFENDANTS TO FILE RESPONSIVE  
PLEADING**

Complaint Filed: January 8, 2025  
Trial Date: None Set

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1 Plaintiff JANE DOE ("Plaintiff") and Defendants CAL TEX HOSPITALITY, L.L.C.,  
2 METRO HOSPITALITY SERVICES, INC., and THANDI ENTERPRISES LLC (collectively,  
3 "Defendants"), by and through their respective counsel, hereby stipulate and agree as follows:

4 1. METRO HOSPITALITY SERVICES, INC., and THANDI ENTERPRISES LLC  
5 were served with the summons and complaint in this matter. METRO HOSPITALITY  
6 SERVICES, INC. has not yet been served. At this time, the aforementioned three (3) Defendants  
7 have elected to be represented by the same counsel and seek to have a singular date to respond that  
8 will enable the parties to streamline the process and avoid duplication and waste while Defense  
9 counsel has represented that counsel is concurrently exploring settlement authority and coverage  
issues.

10 2. The parties agree that there is good cause to extend Defendants' time to respond  
11 to the complaint to February 28, 2025, to allow sufficient time for Defendants to prepare their  
12 response and confirm the availability of insurance coverage.

13 3. The requested extension will not unduly delay these proceedings and is made  
14 in the interest of judicial efficiency.

15 Accordingly, the parties stipulate and respectfully request that the Court enter an order  
16 permitting Defendants CAL TEX HOSPITALITY, L.L.C., METRO HOSPITALITY SERVICES,  
17 INC., and THANDI ENTERPRISES LLC to file a responsive pleading on or before February 28,  
2025.

18 **IT IS SO STIPULATED.**

19 Dated: February 18, 2025

SINGLETON SCHREIBER, LLP

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21 /s/ Meagan Verschueren  
22 By Meagan Verschueren  
23 Attorneys for Plaintiff JANE DOE

24 Dated: February 18, 2025

25 WHELAN LAW GROUP,  
26 A Professional Corporation

27 \_\_\_\_\_  
28 /s/ Brian D. Whelan  
By Brian D. Whelan,  
Attorneys for Defendants CAL TEX HOSPITALITY,  
L.L.C., METRO HOSPITALITY SERVICES, INC.,  
and THANDI ENTERPRISES LLC

## ORDER

Having reviewed the stipulation submitted by the parties, and for good cause shown, IT IS  
HEREBY ORDERED:

1. Defendants CAL TEX HOSPITALITY, L.L.C., METRO HOSPITALITY SERVICES, INC., and THANDI ENTERPRISES LLC shall file their responsive pleading(s) on or before February 28, 2025.

IT IS SO ORDERED.

Dated: **February 18, 2025**

/s/ *Barbara A. McAuliffe*  
UNITED STATES MAGISTRATE JUDGE